

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA)	
)	
vs.)	Cause No. 4:16-CR-00148-HEA
)	
THOMAS CARROLL,)	
)	
Defendant.)	
)	

MOTION FOR PROTECTIVE ORDER

Comes now Defendant and pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure and requests the production of certain documents. In support thereof, the Defendant states as follows:

1. The production of these documents is essential to the due process rights of the Defendant.
2. The information in these documents are necessary and essential for the preparation for sentencing in this matter on July 7, 2016.
3. These requests are in the interest of justice.
4. The Defendant requests the disclosure of all Grand Jury transcripts of all members of the St. Louis Metropolitan Police Department who have testified before the Grand Jury relating to this matter.

Wherefore, the Defendant requests the Court enter a Protective Order consistent with the attached Proposed Protective Order and for such other and further orders as the Court may deem just and proper.

BRUNTRAGER & BILLINGS, P.C.

/s/ Neil J. Bruntrager
Neil J. Bruntrager #29688
Attorney for Defendant
225 South Meramec Ave. Suite 1200
St. Louis, Missouri 63105
(314) 646-0066
(314) 646-0065 Fax
Email: njbatty@aol.com

CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of June 2016 the foregoing **Motion for Protective Order** was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon all attorneys of record.

/s/ Neil J. Bruntrager